

Energy Company Obligation: Help to Heat

Local Authority Flexible Eligibility Statement of Intent

Local authority: West Berkshire District Council

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Contact details: Energy & Project Delivery Project Officer

Energymanagement@westberks.gov.uk 01635 503267

1) Introduction

West Berkshire District Council welcomes the introduction of Flexible Eligibility (FE). The scheme will be utilised for reducing fuel poverty and targeted at those suffering from long term health conditions exacerbated by living in a cold and/or damp home or on a low income living in a poorly rated energy inefficient dwelling.

The average SAP rating for the district is currently 62, Energy Performance Certificate (EPC) Band D. We aim to improve those below the threshold by encouraging energy efficiency improvements.

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements rests with obligated energy suppliers or their contractors. Inclusion in a Declaration of Eligibility issued by the Council to a supplier will not guarantee installation of measures. The final decision will depend on i) identification of measures eligible under Help to Heat ii) the supplier's assessment of the cost-effectiveness of installing measures in relation to achieving its obligation, and iii) whether the supplier has achieved their targets or require further measures to meet their Energy Company Obligation targets.

In identifying households as eligible under flexible eligibility West Berkshire District Council is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. West Berkshire District Council expects any obligated energy supplier, or contractor working on their behalf, to comply with the Data Protection Act, to fully follow Ofgem requirements for the Energy Company Obligation Help to Heat, and to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place. These are covered in a separate memorandum of understanding between the Council and the obligated party.

2) How West Berkshire District Council intends to identify eligible households

2(a) Criteria for identifying 'Living in fuel poverty, but not in receipt of benefits' (Fuel Poor or "FP")

Fuel poverty is defined as living with low income but high heating costs. West Berkshire District Council will assess two elements to determine eligibility:

- i) For the 'low income' portion of this indicator, the referring agency will look to find evidence that a member of the household is in receipt of an ECO qualifying benefit in the first instance. Should the resident not receive any ECO qualifying benefits, we will consider a household in receipt of Council Tax Benefit, Housing Benefit, or with an income of less than £35,000 after tax and after paying for housing and energy costs to be 'low income' for the purposes of this criteria.
- ii) For the 'high cost' portion of the indicator, we will look to identify eligible households as those that have an **Energy Performance Certificate (EPC) rating of 'D' or lower**. These properties will be identified using the Landmark online EPC register. In the event that a property does not meet this criteria, we will identify if the property falls into one of these additional categories which have been selected due to their high energy bills, hard to treat and hard to reach nature:
 - ✓ *Park homes and other permanent caravan residences (regardless of income)*
 - ✓ *Privately rented properties including HMOs (Regardless of income)*
 - ✓ *Properties heated by a fuel other than mains gas*
 - ✓ *Flats above commercial premises*
 - ✓ *System built properties*
 - ✓ *Sheltered housing for the elderly*
 - ✓ *Homes which require cavity wall insulation*
 - ✓ *Homes with require a loft insulation top up*
 - ✓ *Homes which require solid wall insulation*
 - ✓ *Homes with a boiler which meets the ECO Qualifying Boiler criteria*
 - ✓ *Homes which require connection to the mains gas network as part of a wider gas mains upgrade programme (regardless of income)*

2(b) Criteria for identifying 'low income and vulnerability to cold' (LIVC)

West Berkshire District Council will assess two combined elements to determine eligibility:

1. The 'low income' portion of this identifier as set out in the previous section for 'fuel poverty'
2. *Identifying low income and vulnerability to cold*

West Berkshire District Council will target households containing people with the following characteristics, which in part reflects the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes:

- i. Aged over 60
- ii. Children under 5
- iii. Pregnant women
- iv. People with disabilities
- v. Respiratory disease (e.g. COPD, asthma)
- vi. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- vii. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- viii. Substance misusers
- ix. Dementia
- x. Neurobiological and related diseases (e.g. fibromyalgia, ME)
- xi. Cancer
- xii. Limited mobility

- xiii. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xiv. Severe learning disabilities
- xv. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)
- xvi. Other illnesses exacerbated by cold (confirmed by GP)
- xvii. People who move in and out of homelessness
- xviii. People who have attended hospital due to a fall
- xix. Recent immigrants and asylum seekers

West Berkshire District Council will also reserve the right to view applications on a case by case basis, and where it is felt necessary, our officers will use their discretion to approve eligibility where the resident does not meet the above criteria, but is believed to be vulnerable or in need of assistance.

a. Solid wall insulation "in-fill" projects

West Berkshire District Council can also declare households as eligible for HHCRO measures that do not meet the criteria for FP or LIVC, where they are in the same terrace as, immediately adjacent to, or in the same building as households that do meet those criteria. Measures delivered to these premises are known as "in-fill" measures.

Premises with in-fill measures should be listed on the same LA declaration as household(s) that i) are in the same terrace as, ii) in an immediately adjacent building to or, iii) in the same building as households identified by an LA as FP or LIVC.

Only SWI can be installed where the premises are listed in the LA declaration as in-fill.

The specific requirements over the type and number of households that can be eligible as in-fill based on the presence of eligible FP or LIVC households are summarised in Table 1.

Table 1: Summary of the requirements for different property types under in-fill

Property Type	LA declaration requirements	In-fill available
Semi-detached houses or bungalows, or a building containing no more than two domestic premises	At least one of the two-properties must be classified by the LA as FP or LIVC (50% eligibility).	The other property to which it is directly adjoined is eligible for solid wall insulation.
Any other properties that are contained together on a list provided by the LA that are in the same or immediately adjacent buildings ⁵¹ or in the same terrace (eg flats and terraced houses)	At least 50% of properties listed in the declaration must be classified by the LA as FP or LIVC.	The other 50% of properties on the list are eligible for solid wall insulation, provided they are either in the same building, an immediately adjacent building or in the same terrace.

3) Governance

Responsible officer

The officer below will be responsible for signing Declarations on behalf of the local authority.

Job title: Energy & Programme Delivery Project Officer

Telephone: 01635 503267

Email: Energymanagement@westberks.gov.uk

Other West Berkshire District Council officers are also authorised to sign declarations where required, to assist with workloads, absences, or any change of staff

4) Referrals

West Berkshire District Council will ensure appropriate referral processes are in place and will work with relevant partners to identify potentially eligible people in the most effective way, while maintaining the protection of personal data. This will include initial identification of eligible households using the Landmark EPC data for those living in 'fuel poverty' and with 'high costs'. We will also work with Adult Social Care, to determine those that may be vulnerable to living in a cold home, suffering from a qualifying medical condition. All potential eligible households will be contacted and referred to a council nominated supplier.

5) Signature

I hereby approve the implementation of Flexible Eligibility in the West Berkshire District Council area.

Signed:



Date signed:

8/2/2019

Name: Paul Anstey

Position: Head of Public Protection and Culture, West Berkshire District Council